



GTE Service Corporation

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Gail L. Polivy
Senior Attorney

August 19, 1996

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**Federal Communications Commission
Office of Secretary**

Mr. William S. Caton
Acting Secretary
Managing Director's Office
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

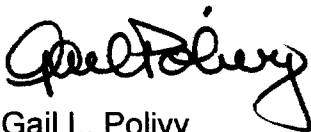
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Re: CC Docket No. 95-116
Telephone Number Portability

Dear Mr. Caton:

Enclosed please find the original signed affidavit of Gregory L. Theus which was submitted (as a facsimile) as part of GTE's Comments filed in the above-referenced docket on August 16, 1996.

Sincerely,



Gail L. Polivy

Enclosure

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Affidavit of Gregory L. Theus

Federal Communications Commission
Office of Secretary

STATE OF TEXAS }
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COUNTY OF DALLAS }

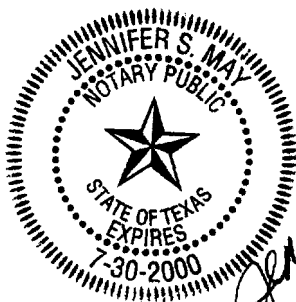
KNOW ALL MEN BY THESE PRESENTS:

BEFORE ME, the undersigned authority, on this day appeared Gregory L. Theus, who is personally known to me, and first being duly sworn according to law, upon his oath deposed and said:

1. My name is Gregory L. Theus. I am over 18 years old and have personal knowledge of the matters I have stated in this affidavit.
2. I am employed at GTE Telephone Operations as Director - Network Planning. As Director - Network Planning, I am familiar with the costs expected to be incurred by GTE to implement local number portability (LNP) as mandated by the Commission's First Report and Order (R&O) in Docket 95-116.
3. The following are GTE's best estimates of the costs of implementing number portability. These estimates were developed for use internally to identify the LNP budget overlays (unplanned additions) for the 1997-2001 planning horizon. It must be understood that these estimates DO NOT REPRESENT THE TOTAL ESTIMATED COST OF LNP DEPLOYMENT FOR GTE.
4. The estimates INCLUDE:
 - a. All costs associated with a third party, LNP Administrator (LNPA), and state / regional LNP SMSs, tentatively designated in paragraph 208 of the R&O as Type 1 costs.
 - b. The costs for GTE specific, number portability, Service Management System (SMS), Service Control Point (SCP), Signaling Transfer Point (STP), and SS7 link hardware and software, and number portability specific switch processor and memory hardware and software, tentatively designated in paragraph 208 of the R&O as Type 2 costs..
 - c. SS7 and AIN implementation costs, generic upgrades, operator services originating line number screening (OLNS) requirements and interoffice trunking estimates due to LNP are included. These costs reflect requirements for activity not planned for 1997. Impacts upon the years 1998 - 2001 are under development.

- d. Costs associated with the development of the LNP Local SMS that is required to interface with the regional LNPA SMSs. Note: These 1997 costs also include start-up costs being expended in 1996.
 - e. A preliminary estimate of the cost to modify the basic telephone number assignment system to support numbers that have been ported out of our switches.
5. The estimates DO NOT INCLUDE the following costs which have not yet been quantified with any reasonable certainty:
- a. Costs to provide enhancements and modifications to the Line Information Data Base (LIDB) system to enable operator services to work in a portable number environment.
 - b. Costs associated with modifying existing GTE legacy Operations Support Systems (OSSs). These systems must be modified to correctly order, bill, administer and maintain ported numbers within the network. GTE has completed only preliminary technical analysis of the required changes to these systems due to the lack of industry consensus on process flows and procedures.
 - c. Increased table maintenance costs associated with the administration of increased Global Title Translation (GTT) activity in the STP that is needed to support the CLASS, Calling Name Delivery and Alternate Billing Services.
 - d. Maintenance costs associated with any manual work required to port a customer out of a GTE office.
 - e. Costs driven by any changes to the current proposed specifications and processes.
6. It is assumed that all customer provisioning and maintenance processes will be mechanized to the extent that is economically feasible, and while most of the costs for this additional mechanization has not been included, neither has any additional labor cost been included in the event GTE must resort to interim manual processes.

The estimated LNP costs for GTE are summarized in the attached table.



Jennifer S. May

Gregory L. Theus

TABLE 1

LNP REQUIREMENTS BASED UPON FCC 7/2/96 RULEMAKING (\$000)										
	1997	1997	1998	1998	1999	1999	2000-2001	2000-2001	TOTAL	TOTAL
	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense	Capital	Expense
NPAC SMS - GTE share		\$11,000		\$10,000		\$10,000		\$10,000	\$0	\$41,000
~ SS7 componets										
STPs	\$1,254	\$708	\$0	\$0	\$1,254	\$708	\$5,016	\$2,832	\$7,524	\$4,248
SCPs	\$26,049	\$17,561	\$13,024	\$8,780	\$8,683	\$5,854	\$17,366	\$11,707	\$65,122	\$43,902
Switch Componets										
Switch Upgrades	\$48,915	\$59,473	\$47,404	\$42,463	\$62,476	\$54,622	\$217,848	\$167,350	\$376,643	\$323,908
Systems										
Local SMS	\$2,179	\$3,167	\$1,776	\$2,700	\$0	\$1,778	\$0	\$3,465	\$3,955	\$11,110
Assignment System		\$60,000								\$60,000
All Other OSSs	TBD	TBD								
Sub Total	\$78,397	\$140,908	\$62,205	\$53,943	\$72,413	\$62,962	\$240,230	\$185,354	\$453,244	\$433,167
Generic Software	\$52,410	\$23,444		TBD		TBD		TBD	\$52,140	\$23,444
Interoffice Trunking										
H/R links	\$7,947	\$0	\$7,333	\$0	\$4,831	\$0	\$28,549	\$0	\$48,660	\$0
ALEC Trunking	\$20,441		\$15,297		\$13,193		\$24,749		\$73,680	\$0
Sub Total	\$80,798	\$23,444	\$22,630	\$0	\$18,024	\$0	\$53,298	\$0	\$174,750	\$23,444
Annual Cost	\$159,195	\$175,352	\$84,835	\$63,943	\$90,437	\$72,962	\$293,528	\$195,354	\$627,994	\$507,611

* Total Capital and Expense currently estimated for the five years = \$1,135,605